

- EXPEDITE
- No Hearing Set
- Trial is Set

Date: Monday, May 20, 2019  
 Time: 8:30 a.m.  
 Judge Christine Schaller

**STATE OF WASHINGTON  
 THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

NO. 17-2-02837-34

Plaintiff,

STIPULATION AND JUDGMENT  
 RE: SPOKANE COUNTY  
 DEMOCRATIC CENTRAL  
 COMMITTEE

v.

EX PARTE

SPOKANE COUNTY DEMOCRATIC  
 CENTRAL COMMITTEE, a Washington  
 nonprofit corporation; JIM  
 CASTROLANG, individually and in his  
 capacity as Executive Director and Chair  
 of the SPOKANE COUNTY  
 DEMOCRATIC CENTRAL  
 COMMITTEE; and JUSTIN  
 GALLOWAY, individually and in his  
 capacity as Treasurer of the SPOKANE  
 COUNTY DEMOCRATIC CENTRAL  
 COMMITTEE,

Defendants.

**JUDGMENT SUMMARY (RCW 4.64.030)**

- A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- B. JUDGMENT DEBTOR: Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation
- C. PRINCIPAL JUDGMENT: \$72,000 with \$36,000 suspended for a period of 4 years contingent on no findings of violations of RCW 42.17A committed during the period of suspension
- D. INTEREST: No prejudgment interest is owed. Principal judgment amount(s) due and owing shall not bear interest unless the

STIPULATION AND JUDGMENT RE:  
 SPOKANE COUNTY DEMOCRATIC  
 CENTRAL COMMITTEE

1 principal judgment is unpaid by the due dates specified  
2 herein

3 E. COSTS AND FEES: \$8,500 in reasonable attorney fees; \$2500 in  
4 investigation costs, and \$300 in court costs

5 F. ATTORNEYS FOR ROBERT W. FERGUSON, Attorney General  
6 JUDGMENT CREDITOR LINDA A. DALTON, WSBA No. 15467  
7 Senior Assistant Attorney General  
8 S. TODD SIPE, WSBA No. 23203  
9 Assistant Attorney General

10 **STIPULATION**

11 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and  
12 Defendant, SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE, desiring to  
13 resolve all claims arising out of the State's Complaint filed against Defendant SPOKANE  
14 COUNTY DEMOCRATIC CENTRAL COMMITTEE, hereby enter into the following  
15 stipulation:

16 1. Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay  
17 the State an assessed civil penalty of \$72,000 for multiple violations of RCW 42.17A, as  
18 alleged in the State's complaint and citizen action notices filed prior to June 6, 2018.

19 2. The parties agree that \$36,000 of the assessed civil penalty will be suspended based on the  
20 following terms and conditions:

21 a. The suspension will be in effect for four years from the date of execution of the  
22 Judgment. During the period of suspension, Defendant SPOKANE COUNTY  
23 DEMOCRATIC CENTRAL COMMITTEE agrees that it will not violate any  
24 provision of RCW 42.17A.

25 b. In the event Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL  
26 COMMITTEE is found by the Public Disclosure Commission or a court to have  
committed a violation of RCW 42.17A during the suspension period, the suspended

1 penalty of \$36,000 will immediately become due and payable within 30 days of such  
2 finding without further intervention of the Court.

3 c. If Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE is  
4 not found to have committed violations of RCW 42.17A by the Public Disclosure  
5 Commission or a court during the suspension period, then the suspended portion of  
6 the penalty will be set aside.

7 3. Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay  
8 the STATE the total amount of \$11,300 as reasonable attorney fees (\$8,500), court costs  
9 (\$300), and costs of investigation (\$2,500) in this action.

10 4. Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay  
11 the State the unsuspended portion of the civil penalty (\$36,000) and fees and costs  
12 (\$11,300) by paying the STATE \$20,000 within 30 days of the entry of Judgment in this  
13 case, and then thereafter starting no later than December 31, 2019, pay \$9,100 per year until  
14 paid in full. Such payment shall be made directly to the Administrative Officer for the state  
15 Public Disclosure Commission with a copy submitted to the Attorney General's Office.

16 DATED this 27<sup>th</sup> day of November, 2018.

17 ROBERT W. FERGUSON  
18 Attorney General

19   
20 LINDA A. DALTON, WSBA No. 15467

21 Senior Assistant Attorney General  
22 S. TODD SIPE, WSBA No. 23203  
23 Assistant Attorney General  
24 Attorneys for State of Washington

25 ETTER McMAHON LAMBERSON VAN WERT  
26 & ORESKOVICH, PC

27   
28 MICHAEL F. CONNELLY, WSBA No. 12448  
29 Counsel for Defendant Spokane County  
30 Democratic Central Committee

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**JUDGMENT**

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General, and S. TODD SIPE, Assistant Attorney General, apprised the Court of their agreement with SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE, appearing through its attorney of record, MICHAEL F. CONNELLY, to the entry of this judgment for the purpose of settling and compromising this action brought under RCW 42.17A. The Court, having reviewed the records and files herein, and having found the settlement to be a just and proper resolution of this matter, and being otherwise fully advised in the premises, it is hereby ORDERED as follows:

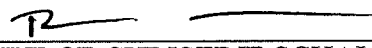
1. Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$72,000 payable to the State of Washington.
2. The amount of \$36,000 of the assessed penalty is hereby suspended upon Defendant, SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE's compliance with the following court-ordered conditions:
  - a. The suspension will be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE shall not violate any provision of RCW 42.17A.
  - b. In the event Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$36,000 shall be immediately due and payable within 30 days of such finding without further intervention of the Court.

1 c. If Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE is not  
2 found to have committed violations of RCW 42.17A by the Public Disclosure  
3 Commission or a court during the suspension period, then the suspended portion of the  
4 penalty shall be set aside.

5 3. Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE shall pay the  
6 STATE the total amount of \$11,300 as reasonable attorney fees (\$8,500), court costs (\$300),  
7 and costs of investigation (\$2,500) in this action.

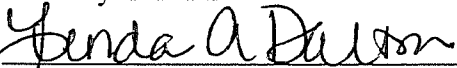
8 4. Defendant SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE shall pay the  
9 State the unsuspended portion of the civil penalty (\$36,000) and fees and costs (\$11,300) by  
10 paying the STATE \$20,000 within 30 days of the entry of Judgment in this case, and then  
11 thereafter starting no later than December 31, 2019, shall pay \$9,100 per year until paid in  
12 full. Such payment shall be made directly to the Administrative Officer for the state Public  
13 Disclosure Commission with a copy submitted to the Attorney General's Office.

14 DONE IN OPEN COURT this 21<sup>ST</sup> day of December, 2018.

15  
16   
JUDGE CHRISTINE SCHALLER

REBEKAH ZINN  
COURT COMMISSIONER

17 PRESENTED BY:  
18 ROBERT W. FERGUSON  
Attorney General

19   
LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
20 S. TODD SIPE, WSBA No. 23203  
Assistant Attorney General  
21 Attorneys for State of Washington

22 *And*

23 ETTER McMAHON LAMBERSON VAN WERT &  
24 ORESKOVICH, PC

25   
By: MICHAEL F. CONNELLY, WSBA No. 12448  
26 Attorney for Defendant Spokane County Democratic  
Central Committee